KENNEDY, JENNIK & MURRAY, P.C.

ATTORNEYS AT LAW

113 UNIVERSITY PLACE NEW YORK, NEW YORK 10003 (212) 358-1500

THOMAS M. KENNEDY tkennedy@kjmlabor.com

FACSIMILE (212) 358-0207

August 22, 2012

Email RBMiller@chrb.gov
Robert Browning Miller
General Counsel
California Horse Racing Board
1010 Hurley Way
Sacramento, CA 95825

Re:

Jockeys' Guild, Inc.

Dear Mr. Miller:

For the reasons expressed at the Exchange Wagering Committee meeting today, the Jockeys' Guild, Inc. is proposing the following amendments to Section Rule 2092.6 of the proposed Rules:

2092.6. Suspension of Occupational License.

- (a) The Board of Stewards may suspend the license of any person if, after a hearing conducted pursuant to the license revocation procedures required by Business and Professions Code 19461, it determines there is probable cause to believe that such person has committed acts of fraud in connection with exchange wagering or any other action or inaction which threatens the integrity or fairness of any exchange wagering.
- (b) Such suspension of license shall be for a period of time designated by the Board of Stewards, unless otherwise determined by the Board, provided that any such suspension under this section shall be limited to ten (10) days and, if probable cause that a violation has occurred has been found, a hearing under Rule 1405 to determine whether a licensee has committed a violation of the rules must be held before any further discipline can be imposed.
- (c) The licensee may make an appeal to the Board by complying with the provisions of Rule 1761 of this division.

Please let me know if you have any questions.

Sincerely,

Thomas M. Kummedy Lwn
Thomas M. Kennedy